

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JOHN D. CERQUEIRA,

Plaintiff,

v.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No: 05-11652-WGY

**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

Plaintiff John D. Cerqueira requests that the following voir dire questions be asked of the prospective jurors in addition to any standard questions asked by the Court (including knowledge of the parties, witnesses, attorneys).

1. Have any of you or your family members or close friends ever worked for an airline?
2. Have any of you or your family members or close friends ever worked in the transportation industry?
3. Are you, a member of your family, or any close friend an active member or reserve member of the United States Armed Forces, including the Army, Navy, Air Force, Marines or Coast Guard?
4. Have any of you or your family members or close friends ever worked in the service and/or hospitality business?
5. Have any of you or your family members or close friends ever worked in law enforcement, including a police department, the Massachusetts State Police, or the FBI?
6. Have any of you or your family members or close friends ever worked as any type of emergency response personnel other than law enforcement, such as a fire department or paramedic unit?
7. Have any of you or your family members or close friends ever worked as medical or mental health professionals or in the office of a medical or mental health professional?
8. Do any of you have family members or close friends who were victims of the September 11, 2001 attacks?

9. Have any of you or any family members or close friends ever been accused of discrimination?
10. Have you or any of your family members or close friends ever been an employee of any person or company that has been accused of discrimination?
11. Do any of you have reservations or concerns with the law that holds a corporation responsible for the actions of its employees?
12. Do any of you believe that an injured person should not be compensated to the full extent the law will allow?
13. Do any of you believe that every effort should not be made to compensate a person injured as the result of discrimination?
14. Do any of you know a person who has been treated for depression, anxiety, or other mental health issues?
15. Have any of you ever heard of Post Traumatic Stress Disorder?
16. Would any of you have any reservations in awarding monetary damages to the fullest extent the law will allow?
17. If the plaintiff proves that he suffered emotional distress as a result of the defendant's actions, would any of you have reservations in awarding the plaintiff damages associated with emotional distress?
18. Do any of you feel that providing compensation for damages for emotional distress or pain and suffering is less important than compensation for lost wages and medical expenses?
19. Would any of you have any reservations in awarding punitive damages against the defendant if the evidence and law supported such a finding?
20. Do any of you feel like you could not award punitive damages, even if you found that the defendant had acted unlawfully?
21. Do any of you feel that it is wrong to award a plaintiff punitive damages to punish a corporation for its wrongdoing?
22. Do any of you feel that awarding punitive damages can do more harm than good?

The Plaintiff requests individualized examination of each juror who responds in the affirmative to any of the foregoing questions.

Respectfully submitted,

**JOHN D. CERQUEIRA,**

By his attorneys,

/s/ David S. Godkin

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CERTIFICATE OF SERVICE

I, David S. Godkin, Esq., hereby certify that a true and correct copy of the foregoing document was delivered to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as non-registered participants on December 29, 2006.

/s/ David S. Godkin  
David S. Godkin

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